

REMARKS

The main independent claims 1 and 8 are rejected as being anticipated based on Narisawa.

Foremost, the whole thrust of the claimed invention is to arrange phone parts to create a vibra alert function within a phone device, product or arrangement that cannot otherwise use conventional vibra motors. In contrast, Narisawa discloses how motor subelements can be arranged in order to be able to create a variety of vibrations or vibration patterns in a well controlled manner. In effect, Narisawa discloses the motor itself and not implementation of the same in a phone device, product or arrangement, as claimed.

In particular, Narisawa discloses a vibration motor (Figure 12) including an elastic material 11 having PZT material 12a-1, 13a-1 with electrodes 12b-1, 12b-2 and 13b-1, 13b-2. However, it is respectfully submitted that Narisawa does not teach or suggest a product cover having two parts coupled by an elastic joint, as recited in claim 1. For example, the reasoning in paragraph 2 of the Office Action does not designate an element in Narisawa corresponding to the product cover recited in claim 1. Moreover, no part or element of Narisawa corresponds to the claimed product cover, especially when the term "product cover" is interpreted consistent with that shown and described in the instant patent application. In addition, the reasoning is analogizing the claimed elastic joint to Narisawa's base 11, so it is not clear what in Narisawa could be analogized to the claimed

product cover consistent with this overall reasoning.

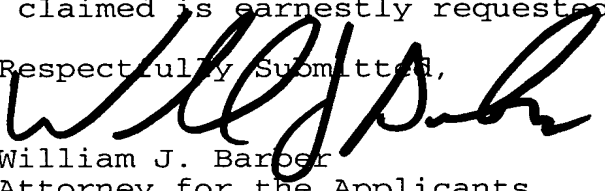
Moreover, dependent claims 16 and 17 are added to recite that the two parts of the product cover are inelastic. Clearly, Narisawa's base 11a, which holds the PZT material 12a-1 and 13a-1, is made of an elastic material, not inelastic as claimed. This limitation further differentiates the claimed product cover from Narisawa's base 11a, which both have actuators arranged therein.

For all these reasons, it is respectfully submitted that Narisawa does not anticipate the subject matter of independent claims 1 and 8.

The remaining claims depend directly or indirectly from the main independent claims, contain all the limitations thereof and are deemed patentable over the cited reference for all the same reasons. Moreover, Kobe does not make up for this deficiency in the teaching of Nishiyama in relation to these claims.

In light of the aforementioned remarks, reconsideration and early allowance of all the claimed is earnestly requested.

Respectfully Submitted,


William J. Barber
Attorney for the Applicants
Registration No. 32,720

/
January 13, 2006
WARE, FRESSOLA, VAN DER SLUYS
& ADOLPHSON LLP
Customer No. 004955
Bradford Green, Building Five
755 Main Street, P.O. Box 224
Monroe, CT 06468
(203) 261-1234